

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

SEAN M. CARROLL)	
Plaintiff)	
)	
Vs.)	C.A. No. 20-cv-00126
)	
WALTER R. CRADDOCK, ESQ., in his Official)	
Capacity as Administrator of the Rhode Island)	
Division of Motor Vehicles)	
Defendant		

**JOINT MOTION FOR ENTRY OF CONSENT
JUDGMENT**

Plaintiff Sean M. Carroll (hereinafter “Plaintiff”) and Defendant Walter R. Craddock, in his official capacity as Administrator of the Rhode Island Division of Motor Vehicles (hereinafter “Defendant”) have agreed to the entry of a Consent Judgment, attached hereto as Exhibit A, and jointly request that this Honorable Court enter said Consent Judgment. In light of this Court’s Memorandum and Order entered on October 2, 2020, wherein it found that Plaintiff has a “likelihood of success” on his claims challenging the constitutionality of R.I. Gen. Laws § 31-3-17.1, the parties agree to the terms set forth in the Consent Judgment. For the reasons set forth here and in the Consent Judgment, the parties ask that this Court enter the Consent Judgment.

Plaintiff,

Sean M. Carroll,

By his Attorneys,

/s/ Thomas W. Lyons

Thomas W. Lyons Bar No. 2946

Rhiannon S. Huffman Bar No. 8642

Cooperating attorneys,

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Defendant,

Walter R. Craddock, Esq., in his official capacity
as Administrator of the State of Rhode Island
Division of Motor Vehicles,

By,

PETER F. NERONHA

ATTORNEY GENERAL

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CERTIFICATE OF SERVICE

I hereby certify that I e-filed the within document through ECF filing on this 31st day of December, 2020 and that it is available for viewing and downloading and that a copy has been served on opposing counsel via the ECF filing system.

/s/ Colleen Cole